

BEYS LISTON & MOBARGHA LLP
Michael P. Beys

November 11, 2016

VIA ECF & FACSIMILE (212-805-7986)

The Honorable Paul G. Gardephe
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: *United States v. Kaleil Isaza Tuzman*, No. S7 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We are counsel to defendant Kaleil Isaza Tuzman and write to supplement our application, dated November 10, 2016, for Mr. Isaza Tuzman to be permitted to spend up to four nights each week at his home in Loch Sheldrake, New York. (ECF No. 151).

If the application is approved, Mr. Isaza Tuzman would be subject to the following schedule, which was the basis for the government's consent: Mr. Isaza Tuzman would be in his home in Loch Sheldrake each week from Saturday evening (after Shabbat) until Wednesday morning, and at Mr. Feinberg's Manhattan apartment, where he currently resides, from Wednesday until sundown every Saturday; the plan is that he would drive to Manhattan very early each Wednesday morning, and spend Wednesdays, Thursdays and Fridays here, in order to meet with his lawyers, go to temple, meet with mental health care providers, and conduct business meetings (all as approved by Pretrial Services); on Saturday evenings, after Shabbat, he would drive back to Loch Sheldrake, where he would stay at his home through and including Tuesday night of each week; in sum, he would spend Sundays, Mondays and Tuesdays in Loch Sheldrake, and Wednesdays, Thursdays, Fridays and Saturdays in New York City.

As discussed with the government, any deviations from the above schedule (for example, Mr. Isaza Tuzman returning to Loch Sheldrake before Shabbat on a Friday if his schedule allows, leaving for Loch Sheldrake on a Sunday morning instead of a Saturday evening, or coming to Manhattan for a legal or medical appointment on a day other than Wednesday through Friday) would be specifically requested to and approved by Pretrial Services.

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We thank the Court again for considering this request.

Respectfully Submitted,

/s/ Michael P. Beys

Michael P. Beys, Esq.
Counsel for Kaleil Isaza Tuzman

cc. All Counsel of Record (via ECF)
Officer John Moscato, U.S. Pretrial Services (via email)